

**MARION LAW LLC**

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**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

NAVIG8 POOL INC.	:	X
	:	
Petitioner,	:	21 Civ. ___ ( )
	:	
v.	:	
	:	
MENA ENERGY DMCC	:	
	:	
Respondent.	:	
	X	

**NOTICE OF PETITION  
TO COMPEL ARBITRATION**

SIRS:

PLEASE TAKE NOTICE that Petitioner Navig8 Pool Inc. (“Navig8”), by and through its attorneys, Marion Law LLC, has filed in the United States District Court for the Southern District of New York a petition to compel arbitration against Respondent Mena Energy DMCC (“Mena”) pursuant to 9 U.S.C. §§ 201 *et seq.*

PLEASE TAKE FURTHER NOTICE that upon the Declarations of Anastasia Kotsaki, dated April 26, 2021, with annexed exhibits 1-7, and Matthew A. Marion, dated April 26, 2021, with annexed exhibits 1-3, and the Memorandum of Law in Support of Petition to Compel Arbitration, Petitioner Navig8 will move this Honorable Court for an order pursuant to 9 U.S.C. § 201 *et seq.* and the Convention on the Recognition and Enforcement of Foreign Arbitral Awards of June 10, 1958, 21 U.S.T. 2517, 330 U.N.T.S., reprinted at 9 U.S.C. §201 *et seq.*, for an order: (1) compelling Mena to arbitrate in New York in accordance with Mena’s charter party with

Navig8; (2) directing Mena to appoint an arbitrator not later than May 26, 2021; (3) providing that, upon (i) the failure of Mena to appoint an arbitrator by May 26, 2021, and (ii) the written request of Navig8, the Court shall appoint an arbitrator on behalf of Mena and direct that the arbitration may proceed without Mena; (4) staying this proceeding after issuing the order requested by Petitioner Navig8 pending issuance of an arbitral award; (5) awarding Navig8 its costs and attorney's fees associated with this Petition; and (6) granting such other and further relief as may be just.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to Local Civil Rule 6.1(b)(2), any answering papers must be served on the undersigned counsel within fourteen (14) days after service of the moving papers.

Dated: Rowayton, Connecticut  
April 27, 2021

MARION LAW LLC  
Attorneys for Petitioner  
Navig8 Pool Inc.

By: /s/ Matthew A. Marion  
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